

EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

CURTIS M. COLLINS,)
)
Plaintiff,)
)
v.) Civ. No. 05-739-SLR
)
WARDEN RICK KEARNEY, et al.,)
)
Defendants.)

CERTIFICATION

At Wilmington this 9th day of November, 2006;

I, Nancy Rebeschini, Esquire, pro se law clerk, and
designated officer for depositions upon written questions held
before me on November 2, 2006, do here by certify that:

1. The deposition of James Chandler was held on November 2,
2006, at 1:30 p.m., at the J. Caleb Boggs Federal Building,
Wilmington, Delaware.

2. On that same date, James Chandler declared before me, an
individual authorized to administer oaths, that his written
answers were true and correct.

3. I read aloud each and every deposition question
submitted by plaintiff, Curtis M. Collins, for deponent, James
Chandler.

4. I personally observed deponent, James Chandler, answer
in writing, the deposition questions.

5. A true and correct copy of the written questions filed
by plaintiff, the original written answers of deponent, and

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written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of November, 2006.



Nancy Rebeschini, Esquire,
Designated Officer

CERTIFICATE OF SERVICE

I hereby certify that on November 9 , 2006, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Erika Yvonne Tross, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiff, Curtis M. Collins, SBI #314128, Delaware Correctional Center, SHU 17-DL-2, 1181 Paddock Road, Smyrna, DE 19977.



Nancy Rebeschini, Esquire,
Designated Officer

Sgt

Sgt. CHANDLER

THE PLAINTIFF "SEEN YOU WHILE HE WAS
LAYING ON THE GROUND, AND I NOTICED
THAT YOU WAS STANDING THERE LAUGHING YOUR
HEAD OFF AT THE SITUATION INSTEAD OF
STOPPING UNFAIR TREATMENT TOWARDS A
INMATE why THEN DIN'NT you "Sgt" PUT A
STOP TO WAS happening?

#② Sgt.

HAVE YOU EVER SEEN OR HEARD A FOLLOW
OFFICERS RASH OUT AT A INMATE BECAUSE
OF FAMILY PROBLEMS?

#③ Sgt. IS IT TRUE WHEN PLAINTIFF COLLINS
CAME TO YOU ABOUT A UNPROFESSIONAL
OFFICER'S BEREZANSKY BEING OUT OF
CONTROL?

#④ Sgt.

IS IT TRUE THAT OFFICER BEREZANSKY
RANG TOWARDS THE PLAINTIFF IN THE
"CHOWHALL" AND ASSAULTED THE PLAINTIFF
By punching THE PLAINTIFF IN THE FACE
FOR NO REASON AT ALL?

Sgt.

Sgt. CHANDLER

#⑤

IS IT THE TRUTH "WHEN AN INMATE" GET SERIOUSLY HURT, THEY MUST IMMEDIATELY BE TAKEN TO MEDICAL IN ANY EMERGENCY SITUATION?

#⑥

WHY THEN DIDN'T YOU SEE THAT THE PLAINTIFF GOT PROPER MEDICAL TREATMENT?

#⑦#

Sgt. IS IT TRUE YOU HAVE A PERSONAL VENDETTA AGAINST THE PLAINTIFF? OR YOU JUST DON'T CARE ABOUT THE WELL BEING OF INMATES?

#⑧#

ALSO IS THE TRUTH THAT "S.C.I. IS A REAL RECALL PRISON?"

#⑨

OK FOR THE RECORD WITH ALL THESE SERIOUS QUESTIONS THAT WAS ASKED HERE TODAY WOULD YOU BE WILLIN TO TAKE A BIG LIE DETECTOR TEST?

#⑩

IS IT TRUE THAT ANY OFFICER WITH A HIGH RANK IS TO TAKE CHARGE WITHOUT ANY OFFICER WITH NO RANK YOU WERE THE ONLY HIGH RANK IN THE CHOWHALL WHY YOU DIDN'T YOU TAKE CHARGE OF THE SITUATION?

- ① It was impossible for the inmate do see me due to the fact that he was face down. Also Captain had been used on him and this greatly impairs the vision. As to the question whether or not I was laughing is untrue I am incorrect. By the time I got to the the back of the chow hall the FM (Curtis Collins) had already be sprayed and hand cuffed at that time.
- ② I don't discuss officer family problems with them so I would not know.
- ③ No
- ④ Inmate Collins was removed from his chow hall due to his trying to incide others to a riot. Mr. Collins was given a direct order by myself to exit the chow hall which he failed to do.
- ⑤ Yes
- ⑥ He was taken to medical by the officer involved, Cleared and placed in a holding cell.
- ⑦ No

(9) NO

(10) Because with three other officers involved in the situation, I was the only one left to watch the other 80 or so high security inmates that were still in the chowhall at that time.

11-2-06


James R. Chandler

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Deposition of Sgt. Chandler

11/2/06

1. No objection
2. Objection - irrelevant
3. Objection - unintelligible
4. Objection - compound question
5. No objection
6. Objection to form
7. Objection compound
8. Objection unintelligible
9. Objection
10. Objection unintelligible

Erika Y. Toss #4506

Date: 11/2/06